



STATE OF IDAHO  
DIVISION OF  
ENVIRONMENTAL QUALITY

1410 North Hilton, Boise, ID 83706-1255, (208) 373-0502

Philip E. Batt, Governor

September 11, 1998

**CERTIFIED MAIL #P 102 109 640**

David P. Edel, Materials Manager  
Bannock Paving Company, Incorporated  
P.O. Box 4002  
Pocatello, Idaho 83205-4002

RE: Bannock Paving Company, Incorporated  
Portable Hot-Mix Asphalt Plant, Cedarapids #1 (#777-00140)✓  
Portable Rock Crushing Plant, Crusher #1 - (#777-00141)  
Tier II Operating Permits

Dear Mr. Edel:

On June 9, 1998, a meeting was held at the Division of Environmental Quality (DEQ) between Bannock Paving Company and DEQ representatives. DEQ and Bannock Paving agreed that a Tier II Operating Permit (OP) should be issued to establish minor source status for co-location of the aforementioned sources. On July 29, 1998, a proposed Tier II OP was issued for public comment. The public comment period was held from July 29, 1998, through August 28, 1998. No comments were received.

Based on review of your application, and state and federal rules and regulations, DEQ finds this project meets the Provisions of IDAPA 16.01.01.400 (Rules for the Control of Air Pollution in Idaho). Enclosed are the Tier II OPs for the Portable Hot-Mix Asphalt Plant, Cedarapids #1 (#777-00140); and for the Portable Rock Crushing Plant, Crusher #1 (#777-00141).

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Health and Welfare, Administrative Procedures Section, 450 West State Street - 10th Floor, Boise, Idaho 83720-5450, within thirty-five (35) days of the date of this decision.

If you have any questions regarding the terms or conditions of the enclosed permits, please contact Susan J. Richards, Bureau Chief, Air Quality Permitting Bureau, Air and Hazardous Waste, DEQ, at (208) 373-0502.

Sincerely,

A handwritten signature in black ink, appearing to read "Orville D. Green" with a stylized flourish at the end.

Orville D. Green  
Assistant Administrator  
Air and Hazardous Waste

ODG:JRYHC:jry...lbannocklbpo-f:COV


Enclosures

cc: M. Lowe, Pocatello Regional Office  
Source File  
COF

September 11, 1998

**MEMORANDUM**

**TO:** Orville D. Green, Assistant Administrator  
Air and Hazardous Waste

**FROM:** Susan J. Richards, Chief  
Air Quality Permitting Bureau  
Air & Hazardous Waste 

**SUBJECT:** Issuance of Tier II Operating Permits to Bannock Paving Company, Inc.  
Portable Hot-Mix Asphalt Plant, Cedarapids #1 (#777-00140)  
Portable Rock Crushing Plant, Crusher #1 (#777-00141)

**PROJECT DESCRIPTION**

Bannock Paving Company, Incorporated, intends to operate its Portable Hot-Mix Asphalt Plant, Cedarapids #1 in conjunction with Portable Rock Crushing Plant, Crusher #1 in both PM-10 attainment and non-attainment areas throughout Idaho. Both facilities are currently permitted to operate separately. A Tier II Operating Permit (OP) has been requested for each facility which will allow for co-located operations while still maintaining minor source status. In addition, Bannock Paving replaced a 400-Kw generator with a 1300-Kw generator at its Crushing plant. The generator replacement has been accounted for in the analysis and permit for the crushing facility.

**DISCUSSION**

On June 9, 1998, a meeting was held at the Division of Environmental Quality (DEQ) between Bannock Paving Company representatives and DEQ representatives. On July 29, 1998, a proposed Tier II OP was issued for public comment. The public comment period was held from July 29, 1998, through August 28, 1998. No comments were received.

**FEES**


Fees apply to this facility in accordance with IDAPA 16.01.01.470. The facility is subject to permit application fee for the Tier II permit of five hundred dollars (\$500.00).

**RECOMMENDATIONS**

Based on the review of current PTCs, company provided information, and applicable state and federal rules and regulations, the Bureau recommends that Bannock Paving Company, Inc., be issued a Tier II OP for the Portable Hot-Mix Asphalt Plant, Cedarapids #1, and a Tier II OP for the Portable Rock Crushing Plant, Crusher #1. The facility has been notified in writing of the required Tier II application fees of five hundred dollars (\$500.00) each for both facilities. The permit will be issued upon receipt of the fees.

ODG:SRVYHC:jji...bannockbpc-f,IMM

**cc:** M. Lowe, Pocatello Regional Office  
Source File  
COF

<b>STATE OF IDAHO</b> <b>AIR POLLUTION</b> <b>OPERATING PERMIT</b>  <b>GENERAL INFORMATION</b>	<div style="text-align: center;"> <b>PERMIT NUMBER</b>  <div style="display: flex; justify-content: center; gap: 10px;"> <div style="border: 1px solid black; padding: 2px 5px;">7</div> <div style="border: 1px solid black; padding: 2px 5px;">7</div> <div style="border: 1px solid black; padding: 2px 5px;">7</div> <div style="border: 1px solid black; padding: 2px 5px;">-</div> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">0</div> <div style="border: 1px solid black; padding: 2px 5px;">1</div> <div style="border: 1px solid black; padding: 2px 5px;">4</div> <div style="border: 1px solid black; padding: 2px 5px;">0</div> </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;"> <b>AQCR</b>  <div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;"></div> </div> <div style="text-align: center;"> <b>CLASS</b>  <div style="border: 1px solid black; padding: 2px 5px; display: inline-block;">A 2</div> </div> <div style="text-align: center;"> <b>SIC</b>  <div style="border: 1px solid black; padding: 2px 5px; display: inline-block;">2 9 5 1</div> </div> </div> <div style="display: flex; justify-content: space-around; margin-top: 10px;"> <div style="text-align: center;"> <b>ZONE</b>  <div style="border: 1px solid black; width: 40px; height: 20px; margin: 0 auto;"></div> </div> <div style="text-align: center;"> <b>UTM COORDINATE (km)</b>  <div style="display: flex; justify-content: center; gap: 10px;"> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> <div style="border: 1px solid black; width: 40px; height: 20px;"></div> </div> </div> </div>	
<b>1. PERMITTEE</b> Bannock Paving Company, Incorporated		
<b>2. PROJECT</b> Tier II Operating Permit		
<b>3. MAILING ADDRESS</b> P.O. Box 4002	<b>TELEPHONE #</b> (208) 232-5796	<b>COUNTY</b> Bannock
<b>4. CITY</b> Pocatello	<b>STATE</b> Idaho	<b>ZIP CODE</b> 83205
<b>5. PERSON TO CONTACT</b> David P. Edel	<b>TITLE</b> Materials Manager	
<b>6. EXACT PLANT LOCATION</b> Portable (Cedarapids #1)		
<b>7. GENERAL NATURE OF BUSINESS &amp; KINDS OF PRODUCTS</b> Hot-Mix Asphalt Production		
<b>8. GENERAL CONDITIONS</b>  <p>This permit is issued according to the Rules for the Control of Air Pollution in Idaho, Section 16.01.01.400 and pertains only to emissions of air contaminants which are regulated by the State of Idaho and to the sources specifically allowed to be operated by this permit.</p> <p>All documents, including, but not limited to, progress reports, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications shall contain a certification by a responsible official in accordance with IDAPA 16.01.01.123. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. The certification shall provide the signature and title of the responsible official and the date of the signature.</p> <p>THE PERMIT HAS BEEN GRANTED ON THE BASIS OF OPERATION AND DESIGN INFORMATION MADE AVAILABLE TO THE DEPARTMENT OF HEALTH AND WELFARE, DIVISION OF ENVIRONMENTAL QUALITY (DEQ). CHANGES IN DESIGN, OPERATION, OR EQUIPMENT THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS MUST BE APPROVED IN ADVANCE BY DEQ.</p>		
		<b>ISSUED DATE</b> <u>SEPTEMBER 11, 1998</u>
<b>ASSISTANT ADMINISTRATOR</b>		<b>EXPIRATION DATE</b> <u>SEPTEMBER 11, 2003</u>
<b>DIVISION OF ENVIRONMENTAL QUALITY</b>		

**AIR POLLUTION OPERATING PERMIT  
PERMITTEE, PROJECT, AND LOCATION**

Bannock Paving Company, Incorporated  
Tier II Operating Permit  
Portable Hot-Mix Asphalt Plant, Cedarapids #1

**PERMIT NUMBER**

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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

**SOURCE**

Portable Hot-Mix Asphalt Plant, Cedarapids #1

**1. EMISSION LIMITS**
**1.1 Asphalt Dryer Emission Limits**

Particulate matter (PM) emissions from the hot-mix asphalt dryer stack shall not exceed 0.04 grains per dry standard cubic foot (gr/dscf), nor shall sulfur dioxide (SO<sub>2</sub>) emissions from the hot-mix asphalt dryer stack exceed the emission rate limit listed in Appendix A of this permit.

**1.2 Other Particulate Matter Emission Limits**

Gases from systems for screening, handling, storing, and weighing hot aggregate, which emanate from a stack, vent, or other functionally equivalent opening, shall not contain PM emissions in excess of 0.04 gr/dscf.

**1.3 Opacity Limit**

Emissions emanating from any stack, vent, or other functionally equivalent opening, shall not exceed twenty percent (20%) opacity for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period as required in IDAPA 16.01.01.625 (Rules for the Control of Air Pollution in Idaho). Opacity shall be determined using the procedures contained in DEQ's "Procedures Manual for Air Pollution Control".

**1.4 Visible Emission Limits at Property Boundary**

Fugitive emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three (3) minutes in any sixty (60) minute period. Visible emissions shall be determined by Method 22, 40 CFR Part 60, Appendix A, or a DEQ-approved alternative method.

**2. OPERATING REQUIREMENTS**
**2.1 Facility Production Limits**

The production rate of the hot-mix asphalt plant shall not exceed a maximum of 936,000 tons per consecutive twelve (12) month period (T/yr), whether located alone or in combination with Rock Crushing Plant, Crusher #1.

**2.2 Non-Attainment Area Production Limits**

2.2.1 The production rate of the hot-mix asphalt plant shall not exceed a maximum of 3,195 tons per consecutive twenty-four (24) hour period (T/day) when co-located with Rock Crushing Plant, Crusher #1, in any PM-10 non-attainment area or proposed PM-10 non-attainment area.

2.2.2 The production rate of the hot-mix asphalt plant shall not exceed a maximum of 6,194 tons per consecutive twenty-four (24) hour period (T/day), when located alone, in any PM-10 non-attainment area or proposed PM-10 non-attainment area.

ISSUED DATE:	SEPTEMBER 11, 1998
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**AIR POLLUTION OPERATING PERMIT  
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Bannock Paving Company, Incorporated  
Tier II Operating Permit  
Portable Hot-Mix Asphalt Plant, Cedarapids #1

**PERMIT NUMBER**

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**SOURCE**

Portable Hot-Mix Asphalt Plant, Cedarapids #1

**2.3 Dryer Burner Fuel Limits**

The sulfur content of the burner fuel shall not exceed 0.5 percent by weight for #2 fuel oil, or 1.75 percent by weight for #4, #5 and #6 fuel oil in accordance with IDAPA 16.01.01.727.

**2.4 Reasonable Control of Fugitive Emissions**

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne as required in IDAPA 16.01.01.651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust emitting operations to human habitations and/or activities and atmospheric conditions which might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

- 2.4.1 Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands;
- 2.4.2 Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust;
- 2.4.3 Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations;
- 2.4.4 Covering, where practical, of open bodied trucks transporting materials likely to give rise to airborne dusts;
- 2.4.5 Paving of roadways and their maintenance in a clean condition, where practical; or
- 2.4.6 Prompt removal of earth or other stored material from streets, where practical.

**2.5 Air Stagnation Advisory Days**

No operation of the hot-mix asphalt plant shall occur during days of Air Stagnation Advisory.

**2.6 Monitoring Equipment**

The Permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications, equipment to continuously measure the pressure differential across the Baghouse.

**2.7 Operations and Maintenance Manual Requirements**

Within sixty (60) days of the issuance of this permit, the Permittee shall have developed an Operations and Maintenance (O&M) Manual for the Baghouse which describes the procedures that will be followed to comply with General Provision B and the Baghouse requirements contained in this permit. The manual shall remain on-site at all times and shall be available to DEQ representatives upon request.

ISSUED DATE:	SEPTEMBER 11, 1998
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Tier II Operating Permit  
Portable Hot-Mix Asphalt Plant, Cedarapids #1

**PERMIT NUMBER**

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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

**SOURCE**

Portable Hot-Mix Asphalt Plant, Cedarapids #1

**2.8 Pressure Drop Across Baghouse(s)**

The pressure drop across the Baghouse(s) shall be maintained within the manufacturer's and O&M Manual's specifications. Documentation of both the manufacturer's and O&M Manual's operating pressure drop specifications shall remain on-site at all times and shall be available to DEQ representatives upon request.

**2.9 Co-Location**

Hot-Mix Asphalt Plant, Cedarapids #1 shall only co-locate with Rock Crushing Plant, Crusher #1. It shall not co-locate with any other facility or portable source without prior DEQ approval.

**3. MONITORING AND RECORDKEEPING REQUIREMENTS**
**3.1 Operating Parameters**

The Permittee shall monitor and record daily in a log, the date and the hot-mix asphalt production in tons per day (T/day). The log shall clearly indicate when the facility is located in a nonattainment area and when the facility is co-located with Rock Crushing Plant, Crusher #1. The most recent five (5) years' compilation of this information shall be kept on-site, in a log, and be available to DEQ representatives upon request.

**3.2 Air Pollution Control Equipment**

The pressure drop across the baghouse(s) shall be monitored and recorded once on a daily basis. The most recent five (5) years' compilation of data shall be kept on-site, in a log, and be available to DEQ representatives upon request.

**3.3 Reasonable Control Measures**

The Permittee shall monitor and record in a log, during operation, the periodic method(s) used to reasonably control emissions from this facility. The log shall include the type of control used (i.e., water, environmentally safe chemical dust suppressants, etc.), as well as the circumstances under which no controls are used. The most recent five (5) years' compilation of data shall be kept on-site and be available to DEQ representatives upon request.

**4. REPORTING REQUIREMENTS**
**4.1 Relocation**

At least ten (10) days prior to relocation of any equipment covered by this permit, the Permittee shall report to DEQ, on relocation forms supplied by DEQ, the following information:

- 4.1.1 Exact location of the new site of operations;
- 4.1.2 Start-up date at the new site of operations and the duration of operations at the new site;
- 4.1.3 Equipment to be used at the new location; and
- 4.1.4 A scaled plot plan clearly showing the property boundary of the new site.

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**PERMIT NUMBER**

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**SOURCE**

Portable Hot-Mix Asphalt Plant, Cedarapids #1

**4.2 Certification of Documents**

All documents, including, but not limited to, application forms for Permits to Construct or operating permits, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications submitted to DEQ shall contain a certification by a responsible official in accordance with IDAPA 16.01.01.123. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

ISSUED DATE:	SEPTEMBER 11, 1998
EXPIRATION DATE:	SEPTEMBER 11, 2003

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Portable Hot-Mix Asphalt Plant, Cedarapids #1

**PERMIT NUMBER**

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The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

**SOURCE**

Portable Hot-Mix Asphalt Plant, Cedarapids #1

**APPENDIX A**
**BANNOCK PAVING COMPANY, INC.  
PORTABLE HOT-MIX ASPHALT PLANT, CEDARAPIDS #1**
**Annual (T/Yr) Emission Limits\***

Source Description	SO <sub>2</sub>
	(T/Yr)
Dryer	91.8

- a. As determined by a pollutant specific U.S. EPA reference method, or DEQ approved alternative, or as determined by DEQ's emission estimation methods in this permit application.

ISSUED DATE: SEPTEMBER 11, 1998  
EXPIRATION DATE: SEPTEMBER 11, 2003

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## TIER II OPERATING PERMIT GENERAL PROVISIONS

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code 39-101 et. seq.
- B. The Permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The Permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the Permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
  - 2) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emission testing (i.e., performance tests) in conformance with state approved or accepted EPA procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 39-111, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environmental Quality.
- E. Nothing in this permit is intended to relieve or exempt the Permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the Permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the Permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the Permittee to develop a list of Operation and Maintenance Procedures which must be approved by DEQ. Such list of procedures shall become a part of this permit by reference, and the Permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I. Performance tests (i.e.; air emission source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with DEQ's Procedures Manual for Air Pollution Control. Such testing shall not be conducted on weekends or state holidays unless the Permittee obtains prior DEQ approval.

The Permittee shall submit a test protocol and a proposed test date for each performance test required by this permit to DEQ for approval at least thirty (30) days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The Permittee shall promptly notify DEQ of any change in the proposed test date and shall provide at least five (5) working days advanced notice prior to conducting any rescheduled test, unless DEQ approves a shorter notice period.

Within forty-five (45) days of the date on which a performance test required by this permit is concluded, the Permittee shall submit to DEQ a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.

The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test conducted pursuant to this permit which demonstrated compliance with the respective pollutant emission limit unless; (1) a more restrictive operating limit is specified elsewhere in this permit or; (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.

- J. The provisions of this permit are severable; and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit shall not be affected thereby.

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